

August 21, 2018

To: FCC, Proceeding 18-141

Please do not approve this petition. My understanding is that this petition will allow ILECs to:

- 1) decrease/eliminate access to equipment in their facilities to other carriers
- 2) stop reselling telecom communication services at wholesale rates to other carriers
- 3) allow ILECs to de-prioritize services offered to other carriers
- 4) allow ILECs to discriminate access to poles, right-of-ways, and other facilities/services requested by other carriers.

These forbearance provisions as well as other elements in the petition will reduce the ability of small ISPs and telecom providers to provide internet and telecommunication services at competitive rates. Allowing small carriers equal access to ILEC facilities and services has promoted competition and expanded service offerings to residential and business customers. Cutting off and/or reducing this access is very likely to decrease service, reduce and/or eliminate competition, and may force small providers out of business.

I own a small business in a rural area near Santa Cruz California. My business depends on reliable internet service. The area where I live is not served by cable, fiber or DSL, or mobile broadband internet services. The major carriers - AT&T, Charter, Verizon, Sprint, etc., have no interest in serving lower density areas like this. My only reliable option is an expensive T1 circuit, since satellite service is highly variable and subject to atmospheric disturbances.

I am therefore very dependent on small ISPs like my current provider, Sonic. Without their commitment to serving the needs of small customers at competitive rates, my business would suffer substantially. Even with Sonic, the cost of T1 circuits is very high.

I am aware of many similar areas in Santa Cruz County as well as across the country. The FCC's Broadband Map show DSL and cable service, however neither is available. The same is true in many other census blocks. We need more competition, not less. Broadband is simply not available at reasonable prices to many citizens.

The petition claims that relief from current provisions of the Communications Act of 1934 will "ultimately reduce pricing for customers and improve the quality and performance of their services" and "will also support growth and create jobs as more providers increase investment in their own networks to offer modern next-generation services." This claim seems very dubious. Given the lack of services in many rural areas, it seems more likely that relaxing these provisions would lead to higher prices, lower quality, and fewer jobs.

The petition also claims: "A regime that imposes special burdens on providers that hold a small and shrinking share of the market distorts competition, harms consumers, and

simply makes no sense." This claim also seems dubious. In addition to Sonic, another local ISP, Cruzio, provides internet service to many businesses and residents in Santa Cruz County. In many rural areas like the one where I live, ILEC internet services have not expanded or improved during the past 20 years. Reducing competition is unlikely to improve this situation. ILECs do not want to serve these areas. We are dependent on small ISPs, who in turn are dependent on non-discriminatory access to ILEC infrastructure and services.

Furthermore, ILECs have a defacto monopoly on the facilities and services they provide. My understanding is that ILECs were granted this monopoly in return for providing universal access. They have not provided universal access and in many cases have made no efforts to do so. They are now requesting relief from the terms they agreed to, and still not offering to meet the access commitments. They want the monopoly without any restrictions or oversight. This seems like a very blatant and egregious violation of public trust.

Based on other comments on the FCC ECFS website many other people seem to agree with these concerns. Please heed the concerns of citizens. Please do not approve this petition.

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